

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

In the Matter of)	
)	
Application by Verizon Virginia Inc., <i>et al.</i>)	CC Docket No. 02-214
for Authorization to Provide In-Region,)	
InterLATA Services in Virginia)	

REPLY COMMENTS OF COVAD COMMUNICATIONS COMPANY

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Senior Counsel

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Introduction

Verizon's pending application for section 271 in-region, inter-LATA authorization in Virginia continues to exhibit serious defects in several aspects. As discussed in detail in Covad's opening comments, Verizon has failed to meet its required burden in several critical areas, including in the areas of access to loop qualification information, interconnection, unbundled loops, dark fiber, billing OSS, and UNE rates. In these reply comments, Covad provides the Commission with additional, newly developed evidence of Verizon's discrimination against competitors in its provision of loop qualification information to competitors, and in its billing practices. For the reasons set forth in Covad's initial comments, and the additional grounds set forth in these reply comments, Covad submits that the Commission cannot approve Verizon's 271 application for interLATA authorization in Virginia.

Access to Loop Qualification Information

In the *UNE Remand Order*, the FCC required incumbent LECs to provide nondiscriminatory access to loop information.¹ The purpose of this requirement is to require incumbents to produce the information that will allow CLECs to determine *for themselves* whether a loop satisfies the prerequisites for the service the CLEC intends to provide.² Furthermore, the *UNE Remand Order* made clear that incumbent LECs are

¹ See *Implementation of the Local Competition Provisions in the Telecommunications Act of 1996*, Third Report and Order and Fourth Further Notice of Proposed Rulemaking, CC Docket 96-98 at ¶ 427-428 (1999); 47 C.F.R. §51.5.

² This purpose is implicit in the FCC's finding that "under its existing rules, the relevant inquiry is *not* whether the retail arm of the incumbent has access to the underlying loop qualification information, but, instead, whether such information exists anywhere within the incumbent's back office and can be accessed by any of the incumbent LEC's personnel. *UNE Remand Order* at ¶ 430. Requiring such "back office"

required to provide pre-order access to loop makeup information.

Covad has recently made new discoveries of methods by which Verizon's loop qualification OSS discriminates against competitors. First, Covad has discovered that Verizon maintains separate and differing sets of loop makeup information for itself and for competitors. Beginning April, 2002, Covad began receiving batch loop qualification data from Verizon in two formats for the Verizon East states (which will be called herein the CLEC extract and the VADI extract). In June, 2002, Covad discovered that Verizon was adding "more data" to one of these two sets, and also that this set of data corresponded to the Verizon retail DSL footprint (the VADI extract). Covad believes that Verizon has inadvertently provided Covad with this VADI extract.³

Subsequently, in August, 2002, Covad began experiencing a high percentage of rejections from Verizon for its UNE loop orders, following a "refresh" of the batch loop qualification data used by Covad to perform loop prequalification. Covad undertook to discover the source of the high number of rejects it was experiencing. Over the course of that inquiry, in addition to uncovering some of the reasons for the rejects Covad experienced, Covad also discovered that the VADI extract corresponding to the Verizon retail DSL footprint contained six, unidentified fields of data not contained in the CLEC extract. Covad also discovered that, in a separate field reported in both the CLEC extract and the VADI extract, the VADI extract contained a value not reported in the CLEC extract.⁴ Specifically, in the field designating reasons why a loop is not qualified for line

information to be made available to the CLEC necessarily excludes "front office" activities engaged on the part of the incumbent to interpret that information.

³ See Appendix A.

⁴ See Appendix B.

shared service, the VADI extract often contained the value “NOT_VZ_CUST.” Covad has reason to believe that this denotes that the end user is not a customer of Verizon’s retail voice product.⁵ Covad also notes that Verizon’s current practice is not to provision line shared loops to competitors where the end users are not also subscribers of Verizon’s retail voice product.

The mere fact that Verizon maintains separate and different underlying loop qualification data for itself and for competitors should arouse the deepest suspicions of this Commission. Covad is still attempting to discover from Verizon what information is contained within the six additional fields in the VADI extract, but the fact that they are contained at all in a batch loop prequalification data set speaks volumes. Indeed, their mere presence in the VADI extract strongly indicates that they are pertinent to Verizon’s retail line sharing provisioning practices, without simultaneously being made available to competitors in the CLEC extract. This is a clear case of discrimination in the provision of loop makeup information to competitors in violation of the *UNE Remand Order*.

Moreover, the presence of the “NOT_VZ_CUST” value in the VADI extract but not in the CLEC extract is itself a clear instance of discrimination. Currently, Covad must submit a line sharing order to Verizon in order to discover that Verizon will not provide a line shared loop because of the presence of third-party voice on the line. Covad does not currently have pre-order access to this information, as Verizon appears to have provided for in the VADI extract. Denying competitors access to this information merely forces them to place unnecessary line sharing orders only to have their orders rejected after they have already sold service to their customers. Verizon’s omission of this data

⁵ *See id.*

from the batch loop qualification extract it provides to competitors thus only serves an anticompetitive effect.

Covad has also discovered that Verizon maintains address-specific information about the end user loops served by individual remote terminals, but does not provide this loop makeup information at pre-order as required by the *UNE Remand Order*. Specifically, during a technical discussion about Verizon's next-generation digital loop carrier (NGDLC) facilities and Verizon's Packet At the Remote Terminal Service (PARTS) held by the New York Public Service Commission on August 28, 2002, Verizon was asked how competitors would be able to determine what end users were served by loops including component digital loop carrier systems capable of providing advanced data services. Verizon responded that competitors could access such information through an offering in its collocation tariffs. Covad has since learned that Verizon makes this information available through a manual, paper process – its region-wide application form for requesting collocation at the remote terminal.⁶ Verizon's charge for providing this information appears to be billed pursuant to the applicable tariff under which a competitor applies for remote terminal collocation, including the governing state's tariff, in this case Virginia.

Verizon has not explained where and in what form it maintains address-specific information on the end user loops served out of particular remote terminals. Covad believes that the underlying data used to provide such address-specific information on which end user loops are served out of a particular remote terminal is maintained in electronic form in Verizon's LFACS database. Indeed, Covad has repeatedly sought pre-

⁶ See Appendix C.

order, electronic and direct access to LFACS, so that Covad and other competitors could have as full a picture of Verizon's loop plant as its outside plant engineers. Unfortunately, Verizon has yet to provide Covad with the loop makeup information in LFACS Covad has repeatedly sought. Instead, with respect to the address-specific information Covad seeks for loops provided over remote terminals, Verizon forces Covad to submit to a cumbersome paper process to seek this information out of its collocation tariff as part of a request for remote terminal collocation – even when Covad does not seek to collocate at the remote terminal. For example, Covad would need such loop makeup information in order to determine where to invest in central office collocations to make use of Verizon's PARTS network facilities, and serve end users over NGDLC remote terminals from a Verizon central office.

Covad has also recently learned of additional means by which Verizon's failure to provide competitors with direct access to the loop makeup information contained in the LFACS database discriminates against Covad. Specifically, during FCC-supervised discussions about Verizon's UNE DS-1 loop provisioning practices held on September 12, 2002, Covad learned that, after receiving a competitor order for high-capacity UNE loop, Verizon's "RequestNET" electronic OSS system initiates an electronic query of several Verizon databases, including LFACS, to determine what facilities were present on a given end user loop. For example, the RequestNET system would initiate queries to determine whether a given end user loop contained apparatus cases, and whether the central office in which the loop terminated contained a multiplexer on which to terminate the loop. All of this information, maintained electronically by Verizon, constitutes loop makeup information that Verizon is required to provide to competitors at the pre-ordering

stage, pursuant to the *UNE Remand Order*. Nonetheless, Verizon does not make access to the underlying databases supplying information to the RequestNET system available to competitors at all, let alone at the pre-ordering stage, and only makes any information from these databases available to competitors filtered through the RequestNET system and after the ordering stage for a particular UNE. Covad submits that this represents a clear violation of Verizon's obligations under the *UNE Remand Order*.

Billing OSS – Checklist Item 2

As Covad explains in its initial comments, Verizon's billing system and performance continue to be fraught with problems. Verizon's billing practices fall short of meeting the FCC's pro-competitive truth-in-billing principles and guidelines. Indeed, Covad continues to experience problems with mysterious charges suddenly appearing on its bills and with Verizon misapplying Covad's payments, resulting in overpayments in the wrong accounts and underpayments (along with late charges and disconnection notices) in the accounts for which Covad's payments were intended.

For example, on an invoice Covad received July 25, 2002, an unexplained charge for \$113,155.96 appeared in a category labeled "Other Charges and Credits." Covad has received charges like this for 5 months worth of invoices. In spite of repeated attempts to obtain additional information from Verizon on the source of these charges, Covad has made no headway in resolving these disputed billing claims with Verizon.⁷

Furthermore, as Covad recently explained in detail to Verizon, Verizon has been repeatedly misapplying Covad payments to the wrong accounts, resulting in

⁷ See Appendix D.

underpayments in the accounts for which payment was intended, unnecessary and unwarranted late fees for Covad, and raising the prospect of unwarranted service disconnection by Verizon. Indeed, Covad has received multiple disconnect notices for several billing account numbers for which Covad's records indicate it has paid all amounts due in full. Verizon's inability to correctly apply Covad's payments results in wasteful efforts by both Verizon's and Covad's organizations to resolve unnecessary billing disputes. Furthermore, as Covad's experience illustrates, these disputes are not isolated occurrences. Rather, Covad's experience illustrates that Verizon's inability to bill competitors correctly is a problem which is growing in scope and prevalence, reflecting a pattern of anticompetitive and discriminatory behavior.⁸

As Covad notes in its initial comments, the Commission has recognized that billing errors can be disabling to CLECs by denying them a meaningful opportunity to compete in many ways. For example, in its Pennsylvania 271 Order, the Commission noted that if CLECs receive bills that are not readable, auditable, and accurate, CLECs must spend additional monetary and personnel resources reconciling each bill and pursuing bill corrections. Because of Verizon's persistent inability to bill it correctly, Covad is forced to more closely monitor its bills and pursue expensive and time consuming billing disputes, claims and queries, denying Covad a meaningful opportunity to compete. Verizon should not be allowed into the interLATA marketplace until it remedies the persistent deficiencies in its billing practices, and meets the conditions outlined in Covad's initial comments.⁹

⁸ See Appendix E.

⁹ See Covad Comments at 18-19.

Conclusion

For the reasons stated herein, the Commission should reject the application of Verizon for authority to provide in-region, interLATA services in Virginia.

Respectfully submitted,

/s/ Praveen Goyal

Anthony Hansel
Senior Counsel

Jason Oxman
Assistant General Counsel

Praveen Goyal
Senior Counsel for Government
and Regulatory Affairs

Covad Communications Company
600 14th Street, N.W.
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12 September 2002

Appendix A

-----Original Message-----

From: peter.mayhew@verizon.com [<mailto:peter.mayhew@verizon.com>]

Sent: Thursday, June 13, 2002 1:55 PM

To: Yang, Joel

Subject: RE: covad east file transfer status-SUCCESS

Hey Joel,

I'm looking at the script I'm going to be writing to do this, and I'm wondering about your end.

You know how we have separate directories for east and west. Do you want me to put them in another directory? Something like east_not_processed? That way, if there are files in there, then you know there's work to be done. If not, it's business as usual.

Just a thought.

Peter Mayhew
AAIS Production Support
Verizon Data Services
813 978 7029
email - peter.mayhew@verizon.com
Pager - 813 225-9525 PIN 1335802
Cell - 813 732-3091

"Yang, Joel"
<JYang@Covad.COM>
Mayhew/EMPL/FL/Verizon@VZNotes

06/11/02 05:08 PM
file transfer status-SUCCESS

To: Peter R.
cc:
Subject: RE: covad east

Hi Pete!

This is great. Since you did mention in parenthesis how you "add more data" while processing them into the version we currently get, I figured the more data the better :)

If I could take a look at one of the "original" files, I can quickly get back to you if it really is the same to us. I really don't mind if I have to process two different formats, since the existing format parsing is already working, and I'll need accommodate the "original" format either way.

Thanks for being so flexible,
Joel Yang, Covad

> -----Original Message-----
> From: peter.mayhew@verizon.com [<mailto:peter.mayhew@verizon.com>]
> Sent: Tuesday, June 11, 2002 1:41 PM
> To: Yang, Joel
> Subject: RE: covad east file transfer status-SUCCESS
>
>
>
> Yeah that's possible.
>
> What I could do is just send over the original files, so that they
are
> all in the same format.
>
> Would that help? Or do you want me to send over all of the current
> ones as well as the other ones listed?
>
> Peter Mayhew
> AAIS Production Support
> Verizon Data Services
> 813 978 7029
> email - peter.mayhew@verizon.com
> Pager - 813 225-9525 PIN 1335802
> Cell - 813 732-3091
>
> "Yang, Joel"
>
> <JYang@Covad.COM> To:
> Peter R. Mayhew/EMPL/FL/Verizon@VZNotes
>
> cc:
>
> 06/11/02 03:11 PM Subject: RE:
> covad east file transfer status-SUCCESS
>
>
>
>
>
>
>
>
> Hi Peter,
>
> Sure that makes a lot of sense!
>
> Could we possibly get the unprocessed data from the first directory
> for the missing cases? It would only be 20 additional wirecenter
> files, much smaller than the LATA files. We really need the data for
> those other 20 wirecenters...
>
> Let me know if that's doable!! Thanks a lot.
> Joel Yang, Covad
>
> > -----Original Message-----
> > From: peter.mayhew@verizon.com [<mailto:peter.mayhew@verizon.com>]
> > Sent: Tuesday, June 11, 2002 11:47 AM

> > To: Yang, Joel
> > Subject: RE: covad east file transfer status-SUCCESS
> >
> >
> >
> > Joel,
> >
> > OK I finally got it narrowed down.
> >
> > We do receive all of the files, and put them in a
> > directory. We then
> > process them (and add more data) and determine which ones are
> > broadband capable and put those in another directory. This is the
> > directory that I
> > look in for the files that get ftp'd off to you.
> >
> > Does this clear things up?
> >
> > Peter Mayhew
> > AAIS Production Support
> > Verizon Data Services
> > 813 978 7029
> > email - peter.mayhew@verizon.com
> > Pager - 813 225-9525 PIN 1335802
> > Cell - 813 732-3091
> >
> >
> >
> >
> > "Yang, Joel"
> >
> > <JYang@covad.com> To:
> > "'peter.mayhew@verizon.com'" <peter.mayhew@verizon.com>
> >
> > CC:
> >
> >
> > 06/10/02 02:27 PM Subject: RE:
> > covad east file transfer status-SUCCESS
> >
> >
> >
> >
> >
> >
> >
> >
> >
> > Hi Peter,
> >
> > I believe I finally know what's going on. My guess is the
extract
> > we get from you is filtered according to the Verizon DSL footprint.
> >
> > For example, LATA 248 (Virginia) has 83 wirecenters total, but
> > the FTP extract we receive from you only contains 9 wirecenters...
> > Thus, there are quite a few wirecenters we are looking for that are

> > missing: BTHIVABT, CHESVACR, HPWLVAHW, MCHVVAMV, MDLTVAMD,
PTBGVAPB,
> > RCMDVAIT, RCMDVALS.
> >
> > The Verizon West extract, on the other hand, has always been
> > complete.
> >
> > Is there any way to obtain extract data for these additional
> > Verizon East wirecenters? As always, thanks for your excellent
> > support.
> >
> > Joel Yang, Covad
> > 408-616-6728
> >
> >
> > -----Original Message-----
> > From: peter.mayhew@verizon.com [<mailto:peter.mayhew@verizon.com>]
> > Sent: Monday, June 10, 2002 10:01 AM
> > To: DL Prequal Support
> > Subject: covad east file transfer status-SUCCESS
> >
> >
> >
> > Joel,
> >
> >
> > Please let me know if this past weekend's files were satisfactory.
> > It looked good from my end, but I'd rather have your word for it.
> >
> >
> > Thanks!
> >
> >
> >
> > Peter Mayhew
> > AAIS Production Support
> > Verizon Data Services
> > 813 978 7029
> > email - peter.mayhew@verizon.com
> > Pager - 813 225-9525 PIN 1335802
> > Cell - 813 732-3091
> >
> >
> >
> > AAIS Broadband <gteadmin@dlscst38.interwan.gte.com>
> > 06/10/2002 02:23 AM MST
> >
> > To: Peter R. Mayhew/EMPL/FL/Verizon@VZNotes,
> > prequal-support@covad.com
> > cc:
> > bcc:
> > Subject: covad east file transfer status-SUCCESS
> >
> >
> >
> >
> > The east files were ftpd successfully
> >

>	>
>	>
>	>
>	>
>	>
>	>
>	
>	
>	
>	

Appendix B

-----Original Message-----

From: Yang, Joel

Sent: Monday, September 09, 2002 1:30 PM

To: Evans, Valerie

Cc: Sharif, Shiva; Cohen, Benjamin; Faix, Chris; Murphy, Kasie; Moyer, Eric; Clancy, Mike; Berard, John; Bandaru, Nagaraju; Hansel, Tony

Subject: VA/MD issues and examples

Hi Mike and Valerie,

Sorry for being a little late on this.
It took a lot more delving that I realized.
Hope it's helpful!

/Joel/

VADI fields vs VZ Fields

=====

Example of customer with 3rd party voice

VZ ILEC extract only shows TN, availability flag, kft, DSL types, reason
code, privacy flag, plus recently, parsed address fields.

VADI extract contains about 6 more fields, but we really don't know what
they are. But more important, it indicates "NOT_VZ_CUST" (i.e. resold
or 3rd party voice), where as the VZ ILEC extract does not.

Sample records for 301-879-7868

Earlier VZ ILEC extract record (used to have only 6 fields):
3018797868|Y|1.300|ADSL-C SDSL ADSL-R IDSL|NULL||

Newer VZ ILEC extract record (parsed address added recently):
3018797868|Y|1.300|ADSL-C SDSL ADSL-R IDSL|NULL|P||13447||NEW
HAMPSHIRE|AV|||||SUIT|7|SILVER SPRING|MD|20904||SILVER SPRING||

VADI extract record ("NOT_VZ_CUST" not reported in VZ ILEC extract):
3018797868|N|N|N|1300||NOT_VZ_CUST|6|,13447,,SUIT,7,,,,,NEWHAMPSHIRE,A
V,,SILVERSPRING,MD,20904|DNS|O|C|

Appendix C

**Collocation Remote Terminal Equipment Enclosure (CRTEE)
Application - Instructions**

For use in the former Bell Atlantic and NYNEX regions

Please fill in all information as instructed below:

Failure to provide all requested information could result in delays in the processing of this application.

Customer Information

1. **Company:** *Name of Company applying for Collocation*
Street: *Address of Company include City, State, and ZIP*

2. **Contact Name:** *Name of person to whom all information should be conveyed or questions addressed.*

Telephone #: *Telephone # of Company contact*

Fax #: *Fax # of Company contact*

E-Mail Address: *E-Mail address of Company contact*

3. **24-Hour Emergency Contact Telephone #:** *Enter Telephone # of the 24-hour emergency contact.*

4. **Desired Service Date:** *Enter the date service is desired (in accordance with tariffed intervals).*

5. **ACNA:** *Enter the Access Carrier Name Abbreviation (ACNA) This is a three to four character code used to identify a telecommunication company.*

AECN: *Enter the Alternate Exchange Carrier Name (AECN). A unique identifier for a CLEC.*

6. **Billing Information:**

Billing Manager Name: *Enter the name of the person to whom all billing information should be conveyed.*

Company Name: *Name of Company to which all billing information is to be provided*

Street Address: *Company address include City, State, and ZIP.*

II. Remote Terminal

1. Please provide the location of the remote terminal. Identify street address, city, state, and municipality. If the location can not be identified by a street name(s) please provide two other identifiers: i.e. pole numbers, manhole #, and/or landmarks.
2. Please enter the desired serving address.
3. Please enter State, Wire Center and CLLI Code for CORT Report

III. Application Queries

Please check all that apply

Remote Terminal Preliminary Engineering Record Review: Upon request, VZ will provide a Preliminary Engineering Records Review for an Remote Terminal (RT) location identified to VZ by the CLEC. In response to the request VZ will conduct a search of its records and identify for the CLEC: the type of enclosure and whether the site is a private property easement or public license. If the site is on private property, VZ will inform the CLEC whether VZ's rights under its easement for that location can be assigned to the TC for purposes of the application request.

Remote Terminal Serving Address: Upon request, VZ will provide a range of addresses served by a Remote Terminal (RT) location. The response will identify each Feeder Distribution Interface Interconnection (FDII) served by the RT and a list of serving addresses for each FDI.

Remote Terminal Site Survey for Space: Based upon the type of equipment to be collocated, the type of collocation and VZ UNE elements to be interconnected VZ will determine if the site has space and whether the site's easements allow the type of collocation requested by the CLEC.

Central Office Remote Terminal: Upon request, VZ will provide the following information for a central office identified to VZ. In response to the request, VZ will conduct a search of its records and return: 1) A list of the remote terminals subtending to an identified central office including the addresses of each remote terminal and their CLLI codes. 2) The list of addresses or address ranges, as applicable, served by each remote terminal. 3) The number of distribution pairs fed from the remote terminal, and 4) The type of feeder cable (copper/fiber/both) of each remote terminal.

IV. Feeder Distribution Interface Interconnection

Please indicate whether or not a Feeder Distribution Interface Interconnection (FDII) application has been submitted. Provide the FDII application # if available.

V. Type of Collocation Requested

1. Please indicate the type(s) of collocation arrangements you are willing to consider, the associated state tariff code under which you are applying (See Appendix A), your order of preference, as well as your desired and minimally acceptable requirements for each option. Verizon will offer you your minimally

acceptable requirement on a first preference before considering your next preference.

2. *Please provide the reason for revision to a previously submitted CRTEE application and the original application number.*

VI. Type and Number of Terminations to be Cabled

Please indicate the quantity for each of the termination types to access Verizon Unbundled Elements for every collocation arrangement that you have requested in Section V. Terminations to be cabled are those that will be run between the collocated equipment inside the RTEE and the associated demarcation point for access to VZ cable facilities. Terminations that are protected with Overvoltage protectors can be requested to a TOPIC for access to VZ Unbundled Sub-Loop Arrangements.

Certain tariffs and products have minimum ordering increments and will be cabled and billed accordingly. (Please refer to Appendix B of the application.)

VII. DC Power Requirements

Indicate your Company's requirements for -48V Battery & Ground power. Provide the total number of "A" feeds and/or the total number of "B" feeds for each type of collocation request. Indicate the requested load per feed and the fuse size per feed. The CLEC is responsible for the engineered power consumption of the collocation arrangement and should consider any special circumstances in determining load and fuse size of each feed. Fused capacity may be as high as but shall not exceed 2.5 times the load per feed and must be ordered consistent with industry standard fuse sizing shown below – Load must be ordered in whole numbers. Fractions will not be accepted. (VZ bills for DC power in accordance with the applicable tariff provision, See Appendix C of the Collocation Application. Please note that the FCC tariff currently bills based on fused capacity.)

VIII. Technical Equipment Specifications

1. *List the equipment that your Company requires in the RTEE. Include the Manufacturer/Model #, Dimensions – HxWxD, Quantity, DC Power Load in AMPS, Heat Load in BTU's and Common Language Equipment Identifier (CLEI). Complete Attachment A – List of Pug-Ins (Cards) and provide a copy of the product's*

technical description and a block diagram/schematic of the equipment layout.

2. Network Equipment Building System (NEBS) Conformance Requirements

A completed NEBS Conformance Checklist and the supporting data for Risk/Hazard related elements are required and must be submitted to Verizon Technology and Engineering/Maintenance Engineering. (See www.bellatlantic.com/wholesale/ Customer Documentation, Volume I of the CLEC Handbook/Sections 8.7.1.2 Verizon's Requirements – Applicability and 8.7.1.4 - Test Requirements – Applicable NEBS Requirements). All equipment and framework (relay racks) to be installed or placed in Verizon RTEEs must be tested and meet the NEBS Level 3 requirements

Please provide the date that the NEBS Conformance Checklist was submitted to Verizon Technology and Engineering/Maintenance Engineering. If the NEBS Conformance Checklist was submitted with a prior application please provide the date it was submitted, the Location, and the Control # assigned.

Is the framework/relay racks to be installed NEBS compliant? ☐ Yes ☐ No

Note: Verizon will be responsible to install all equipment for both physical and virtual CRTEE.

IX. Additional Requirements for Collocation Remote Terminal Equipment Enclosure

1. *In addition to the information requested in Section VIII, please provide the following:*
 - A. *Outline specification which includes a wiring diagram*
 - B. *A front equipment drawing showing where plug-ins are to be installed.*
 - C. *Training that will be provided to VZ employees.*
 - D. *Test Manuals for equipment.*
2. *Please identify by manufacturer and model # any specific tools that will be provided.*
3. *Please identify by manufacturer and model # any test equipment that will be provided:*

X. Cable and Conduit Information

Verizon will install and terminate the cable into and within the RTEE. Cable connecting the TC network and the RTEE will be interconnected at a mutually agreed upon point per a field meeting of the TC and Verizon.

1. Indicate origination and location of cable terminations. (Be Specific)

2. Fiber Cable Requirements

- A. Indicate the number of cables to be placed.*
- B. Indicate the diameter of the cables.*
- C. Indicate the number of fibers required per cable.*
- D. Indicate the Manufacturer Name:*
- E. Indicate the type of Single Mode Fiber to be used.*
- F. Indicate the Loss Decibels per Kilometer*

3. Copper Cable Makeup

- A. Indicate the number of cables to be placed.*
- B. Indicate the diameter of the cables.*
- C. Indicate the number of pairs required per cable.*
- D. Indicate the Manufacturer Name*
- E. Indicate # of Protectors (should be equal to C)*
- F. Indicate Type of Protector*
- G. Indicate Protector Manufacturer*
- H. Indicate Protector Housing Type*
- I. Indicate 3 dimensional Protector Housing size*

4. Conduit Requirements

- A. Have licensing agreements for this location been established?
Yes or No*
- B. If agreements have been established please provide the contract number.*
- C. Identify the ingress (e.g. Pole #, Manhole #)*
- D. Identify the egress. (e.g. Pole #, Manhole #)*

XI. Certificate of Insurance

A Certificate of Insurance must be provided for all new sites prior to occupancy. Please indicate whether or not you are providing the Insurance Certificate. If the Certificate is attached provide its expiration date. If the

Certificate is not being provided with this application please provide the date on which it will be submitted.

XII. Remarks

This field is to be populated with additional information that your Company would like to convey to Verizon.

XIII. Loop Special Billing Numbers (SBN) Requirements

Please complete the Special Bill Numbers Request form found in Appendix C of this application. By submitting this form you will ensure that the appropriate SBN's are established for this collocation arrangement.

Please submit this application, all supporting documentation and the application fee to:

Collocation Manager

Verizon

125 High Street, Room 509

Boston, MA 02110

E-Mail Address: Collocation.applications@verizon.com

Appendix D

-----Original Message-----

From: Lipski, Mona
Sent: Thursday, September 12, 2002 2:30 PM
To: Evans, Valerie
Subject: South Collocation BANs

Valerie,

We have a problem with the billing on the Verizon South Collocation BANs, which includes Virginia.

For example, on the July 25, 2002 invoice, there are \$113,155.96 in what are called Other Charges and Credits. This is the section where any non-recurring charges (CO buildout charges, application fees) are billed, as well as any fractional charges (backbilling for prior months). Verizon did not provide any identifying information with these charges. We need to know which site is being billed for and Verizon needs to provide us with the CLLI code, which is the code that identifies the site. Without it, we have no idea what site we are being billed for. There are charges like this, without the CLLI code, on 5 months worth of invoices. We have been asking Verizon to provide the needed information, but have not yet received it.

Mona Lipski
Claims Analyst
(408) 616-6993

Appendix E

-----Original Message-----

From: Evans, Valerie
Sent: Wednesday, September 11, 2002 5:16 PM
To: Brandt, Mark; 'jeannine.t.kirkman@verizon.com'
Cc: Ed Morton (E-mail)
Subject: RE: Verizon payments

Mark and Jeannine-

I would like to participate so please let me know when you schedule.

Jeannine, as the update suggests, the issue seems to be growing as there are more payments to investigate. Please note that we are also seeing an increase in the number of collection notices. As you can imagine, this is particularly frustrating since Covad's research is indicating that we are current and VZ needs to apply payments or credits. I would ask that you work with Ed Morton to ensure his organization is addressing all the outstanding credit issues. I would also ask that your team cease from sending the collection notices until we can get all these issues resolved.

Below are 2 e-mails from Covad that demonstrate the problems we are encountering with VZ properly applying payments and/or credits. To date, we have received no response from Bob Lamothe regarding the payments being properly posted. As for the 2nd issue, it is completely in VZ's hands to apply the credits and get the account current. As noted, Covad was previously told there were only 2 manual charges that VZ applied and had to credit. It appears as if there were 5 manual charges applied and the other 3 are creating the outstanding balance. All manual adjustments were to be credited by VZ with no action necessary from Covad. Now Covad will have to submit more claims to get this resolved.

In closing, both VZ and Covad's organizations are spending inordinate amounts of time trying to get to the root of why VZ is not properly applying payments or credits. This is in addition to the time being spent on the claims and the lack of their resolution. Unfortunately, the burden is on Covad to get these issues resolved and we are finding that instead of things getting better, the issues are growing and the amount of time to get resolved is taking longer. Ed, I'd like to schedule a meeting with you to discuss in person.

Thanks,

Valerie Evans
Vice President-External Affairs
Covad Communications Company
phone 202-220-0416
mobile 202-423-4844
e-fax 509-694-0017
e-mail vevans@covad.com

-----Original Message-----

From: Fagioli, Anna
Sent: Wednesday, August 21, 2002 12:43 PM
To: 'robert.j.lamothe@verizon.com'
Subject: Disconnect Notices

Robert,

I just received 2 disconnect notices for the Bans listed below. Since these notices do not specify dates or invoice numbers I am assuming that they are for the July 13 bill date. These accounts are paid and the majority wired to Verizon on or before the due date. I have provided you with all the payment information.

603-K91-0018-123	\$692.00	Paid 8/20/02	Wire# 191913	\$692.00
617-K41-0069-527	\$1369.22	Paid 8/13/02	Wire# 191880	\$1,892.29

212-K41-0017-208	\$8333.24	Paid 8/20/02	Wire# 191913	\$12,371.57
516-K41-0095-386	\$1957.82	Paid 8/12/02	Wire# 191871	\$1,957.82
516-K41-0098-424	\$1957.82	Paid 8/12/02	Wire# 191871	\$1,957.82

Before any further action is taken or you need further information, please feel free to contact me.

Thank you,
 Anna Fagioli
 Bill Verification Specialist
 Covad Communications
 408-616-6815 direct

-----Original Message-----

From: Lipski, Mona
 Sent: Tuesday, September 10, 2002 2:43 PM
 To: 'len.g.canalini@verizon.com'; 'joe.a.corticada@verizon.com'
 Cc: edward.f.morton@verizon.com; mike.jernigan@verizon.com; Evans, Valerie; Henning, Meghan
 Subject: RE: manually billed Loop line share Jul-Dec 2001

Sorry to have to bring this up again, but we still have a problem. I just got off an hour+ call with Donald Soracco, who is in collections, and we were going over BAN 212-M40-0028-375. There is \$94,000 showing as past due on this BAN, which we are being charged late fees on, and we (Covad) do not know what makes up this balance. We show all payments being made. Donald and I went thru all of the charges and credits on this account since November 2001, and we found the following adjustments were made to the account, all pertaining to the manually billed loop line share issue:

Date posted	Amount of Adjustment	Verizon Transaction ID
1/23/02	\$56,091.00	1004323050
1/23/02	\$12,173.00	1004323118
2/5/02	\$31,032.00	1004367842
2/5/02	\$9,064.86	1004367847
2/13/02	\$27,142.00	1004399493

According to Len's e-mail below, there were only two adjustments made to this account regarding this issue.

When can the rest of these adjustments be credited so that this account stops incurring late fees?

Mona

-----Original Message-----

From: len.g.canalini@verizon.com [<mailto:len.g.canalini@verizon.com>]
 Sent: Friday, May 24, 2002 9:14 AM
 To: Evans, Valerie; Lipski, Mona

Cc: edward.f.morton@verizon.com; mike.jernigan@verizon.com;
karen.m.clarke@verizon.com
Subject: manually billed Loop line share Jul-Dec 2001

Valerie, Mona,

Here is the details I promised on the call yesterday showing the amount of the loop line sharing from July-Dec 2001. September and October were never billed that's why there are no figures for those months represented here.

If I can be of further assistance I can be reached at 718 473 8400

Len

July 2001	\$56407.00	212 M40 0003 957	invoice 01277-NY
Oct. 2001	\$31032.00	212 M40 0028 375	invoice 02035-NY
Nov. 2001	\$56091.00	212M40 0003 957	invoice 02035-NY
Dec 2001	\$27142.00	212 M40 0028 375	invoice 02063-NY

-----Original Message-----

From: Brandt, Mark
Sent: Tuesday, September 10, 2002 9:26 PM
To: 'jeannine.t.kirkman@verizon.com'
Cc: Evans, Valerie
Subject: RE: Verizon payments

Jeannine,

Should we plan on having a follow-up call next week? My schedule is fairly open on Monday and Tuesday 9/16 & 9/17.

Regards,

Mark

-----Original Message-----

From: Lipski, Mona
Sent: Tuesday, September 10, 2002 8:34 AM
To: Brandt, Mark; Evans, Valerie; 'jeannine.t.kirkman@verizon.com'
Cc: Henning, Meghan
Subject: Verizon payments

I wanted to update you on the issue of the misapplied wire transfers.

I've sent Mary Beth Kline an additional 42 wire transfer remittance notices to research in order to determine if there were more payments that had been applied to the incorrect invoices. Beth informed me Friday, Sept. 6, that they wanted to research all of the wire payments before moving any of the payments to the correct invoices, to prevent double work, moving a payment off of an invoice, just to have to turn around and apply another payment. She said she should "have a better view of this by next week", so I hope to hear more from her by the end of this week.

Mona Lipski

Claims Analyst
(408) 616-6993